

NANCY WINPIGLER SHOEMAKER
a/k/a Nancy Winpigner
A-101 Waverly Apartments
Frederick, Maryland 21701
Plaintiff

VS.

CHARLES MELVIN SHOEMAKER
Route 2, Box 10-D
Middletown, Maryland 21769

* NO. 28,407 EQUITY
* IN THE
* CIRCUIT COURT
* FOR
* FREDERICK COUNTY
* MARYLAND

PETITION TO FILE AMENDED BILL FOR PARTITION
AND SALE OF REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Nancy Winpigner Shoemaker, a/k/a Nancy Winpigner, Petitioner, by Franklin D. Stillrich, her solicitor, respectfully submits to your Honorable Court as follows:

FIRST: That a Bill for Partition and Sale of Real Estate was filed in this Court on the 25th day of September, 1978, being No. 28,407 Equity, against the Defendant, Charles Melvin Shoemaker.

SECOND: That the Defendant, Charles Melvin Shoemaker filed a timely answer to said Bill for Partition.


THIRD: That your Plaintiff did not include the mortgagee, First Federal Savings and Loan Association of Hagerstown as a named party defendant.

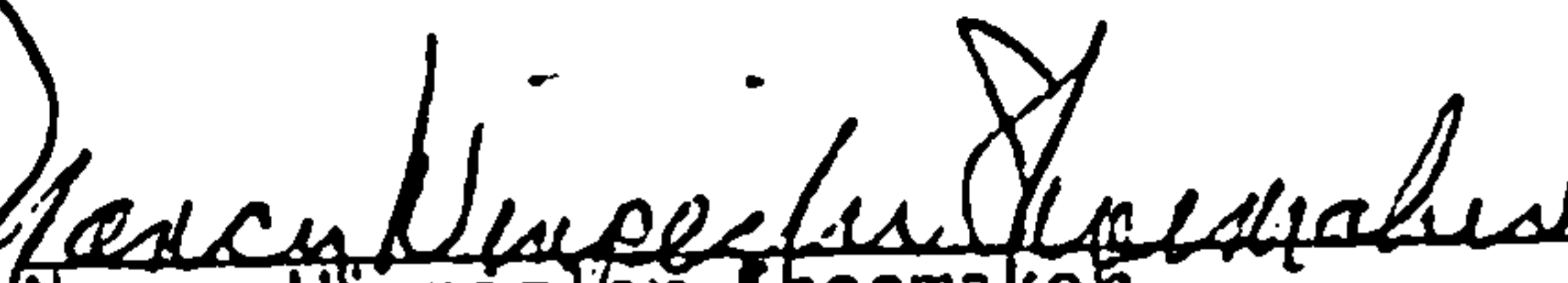
FOURTH: That the said mortgagee desires to be named as a party defendant.

FIFTH: That the filing of an Amended Bill for Partition naming the said mortgagee, First Federal Savings and Loan Association of Hagerstown as a party defendant will not hinder or impair the rights of the Defendant, Charles Melvin Shoemaker.

SIXTH: That counsel for the Defendant, Charles Melvin Shoemaker, consents to the passage of an order allowing the Plaintiff to file an Amended Bill for Partition.

WHEREFORE, your Plaintiff prays that she be allowed to file an Amended Bill for Partition and Sale of Real Estate as outlined aforesaid.


Franklin D. Stillrich
150 West Patrick Street
Frederick, Maryland 21701
Phone: 662-8114
Solicitor for Petitioner


Nancy Winpigner Shoemaker
a/k/a Nancy Winpigner
Petitioner